

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

**U.S. EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,**

Plaintiff,

v.

**DEFENDER ASSOCIATION
OF PHILADELPHIA**

Defendant.

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CIVIL ACTION NO.
2:19-cv-01803-CMR

**DEFENDANT’S RESPONSE IN OPPOSITION
TO PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT**

Defendant, the Defender Association of Philadelphia (the “Defender Association”), by and through its undersigned counsel, hereby submits its Response in Opposition to the Equal Employment Opportunity Commission’s (the “EEOC”) Motion for Summary Judgment and accompanying Memorandum of Law and Exhibits on behalf of claimant Megan Perez (“Perez”). For the reasons set forth below the EEOC is not entitled to summary judgment as a matter of law.